

BEFORE THE OIL CONSERVATION COMMISSION
OF THE STATE OF NEW MEXICO

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IN THE MATTER OF THE APPLICATION

OF

BENSON-MONTIN-GREER DRILLING
CORPORATION

Case 4067
~~4057~~

for 160-acre spacing in the
La Plata-Gallup Oil Pool.

APPLICATION

COMES NOW BENSON-MONTIN-GREER DRILLING CORPORATION and respectfully makes application to the Oil Conservation Commission of the State of New Mexico for an Order establishing 160-acre spacing in the La Plata-Gallup Oil Pool in San Juan County, New Mexico, as the same is presently defined by the Commission, together with all acreage included in the La Plata-Mancos Unit Area, which Unit Agreement has been heretofore approved by the Commission.

Applicant requests that the unit allowable for a 160-acre unit in the La Plata-Gallup Oil Pool be allocated on the basis of four times the normal unit allowable for the Northwestern New Mexico District, and that no credit be given for any depth factors for the reason that Applicant expects that production will occur in said pool from depths both above and below the 5000 foot level.

Applicant further requests that the 160-acre spacing Order be limited to the exterior boundaries of the La Plata-Mancos Unit Area and that the usual provisions with respect to areas within one mile of the La Plata-Gallup Pool limits be disregarded.

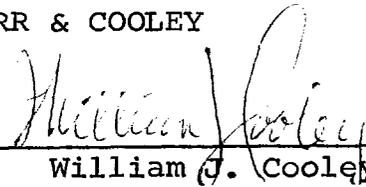
Applicant contends and will submit persuasive evidence to the effect that one well will economically and efficiently drain an area in excess of 160 acres in the La Plata-Gallup Oil Pool and the lands covered by the La Plata-Mancos Unit Agreement.

Applicant further contends that the approval of the subject Application will prevent waste and protect relative rights in the area involved.

Respectfully submitted,

BURR & COOLEY

BY



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